

FILED

JAN 27 2016

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                               )  
Plaintiff,                 )  
                               )  
v.                             )  
                               )  
SALVADOR ROJAS-ACOSTA, )  
                               )  
Defendant.                 )

No. 4:16CR0038 CDP/DDN

INDICTMENT

COUNT I

The Grand Jury charges that:

On or about January 10, 2016, in St. Louis County, within the Eastern District of Missouri, and elsewhere,

**SALVADOR ROJAS-ACOSTA,**

the defendant herein, did travel in interstate commerce from the State of Illinois to the State of Missouri, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, drug trafficking, in violation of Title 21, United States Code, Section 841(a)(1), and thereafter performed and attempted to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of such unlawful activity, to wit: the receipt, possession and concealment of approximately \$529,609.00 dollars in United States currency, in violation of Title 18, United States Code, Section 1952.

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 981(a)(1)(c), and Title 28 United States Code , Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 1952, as set forth in Count I of this Indictment, the defendant shall forfeit to the United States of America any property, constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such violation and any property used, or intended to be used, in any manner or part to commit or to facilitate the commission of such offenses.

2. The specific property subject to forfeiture includes, but is not limited to:

a) \$529,609.00 dollars in United States currency.

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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JOHN T DAVIS, #40915MO  
Assistant United States Attorney